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**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

**In re:**

**JADOOTV, INC.,**

**- and -**

**CLOUDSTREAM MEDIA, INC.,**

**Debtors.**

- ☐ Affects JadooTV, Inc.  
☐ Affects CloudStream Media, Inc.  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-41283 (WJL).*

Bankruptcy Case  
No. 19-41283 (WJL)

Chapter 11

(Lead Case)

(Jointly Administered)

**EX PARTE MOTION OF DEBTORS FOR  
ORDER CONTINUING STATUS  
CONFERENCE**

[No hearing requested]

JadooTV, Inc. (“JadooTV”) and CloudStream Media, Inc. (“CSM”), as debtors and debtors in possession (collectively, the “Debtors”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), hereby submit this *ex parte* Motion (the “Motion”), pursuant to section 105(a) of title 11, United States Code (the “Bankruptcy Code”), Rule 9006 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 9006-1 of the Bankruptcy Local Rules for the United States Bankruptcy Court for the Northern District of California (the “Local Rules”), for entry of an order continuing the chapter 11 status conference in these Chapter 11 Cases (the “Status Conference”) to a hearing on August 28, 2019, at 10:30 a.m. (Pacific time).

In support of this Motion, the Debtors respectfully submit as follows:

## MEMORANDUM OF POINTS AND AUTHORITIES

### I. JURISDICTION

The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334, the *Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges*, General Order 24 (N.D. Cal.), and Rule 5011-1(a) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California (the “Bankruptcy Local Rules”). This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

### II. BACKGROUND

On May 31, 2019 (the “Petition Date”), the Debtors commenced with the Court voluntary cases under chapter 11 of the Bankruptcy Code. The Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee, examiner, or statutory committee of creditors has been appointed in either of the Chapter 11 Cases.

On July 17, 2019, the Court held a status conference in these Chapter 11 Cases, and at the conclusion thereof, the Court continued the Status Conference to August 14, 2019, at 10:30 a.m.

On August 7, 2019, the Debtors filed the *Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a) and 363(b) for Authority to Enter Into Stock Purchase Agreement and Repurchase Securities* [Dkt. No. 87] (the “Stock Repurchase Motion”) and the *Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a) and 363(b)*

1 *for Authority to Advance Legal Fees and Other Defense Costs of Debtors' CEO* [Dkt. No. 89] (the  
2 "Defense Costs Motion"). Both the Stock Repurchase Motion and the Defense Costs Motion are  
3 scheduled be heard on August 28, 2019 at 10:30 a.m. (Pacific time).

4 **III. RELIEF REQUESTED**

5 By this Motion, pursuant to section 105(a) of the Bankruptcy Code, Bankruptcy Rule 9006, and  
6 Local Rule 9006-1, the Debtors seek entry of an order continuing the Status Conference to August 28,  
7 2019, at 10:30 a.m. (Pacific time), to be heard at the same time as the Stock Repurchase Motion and the  
8 Defense Costs Motion.

9 The Debtors submit that continuing the Status Conference by two weeks so that it can be heard  
10 at the same hearing as the other matters in these Chapter 11 Cases will be an efficient use of the resources  
11 of the Debtors, the Court, and all parties in interest. Prior to the filing of this Motion, the Debtors, by  
12 their undersigned counsel, confirmed with the Office of the United States Trustee (the "U.S. Trustee")  
13 that the U.S. Trustee did not have an objection to continuing the Status Conference to August 28.

14 **IV. NOTICE**

15 Notice of the Motion will be provided to (i) the Office of the United States Trustee for Region  
16 17 (Attn: Tracy Hope Davis, Esq. and Jason Blumberg, Esq.); and (ii) those persons who have formally  
17 appeared in these Chapter 11 Cases and requested service pursuant to Bankruptcy Rule 2002.

18 No previous request for the relief sought herein has been made by the Debtors to this or any other  
19 Court.

20 WHEREFORE the Debtors respectfully request entry of an order granting the relief requested  
21 herein and such other and further relief as the Court may deem just and appropriate.

22 Dated: August 9, 2019

Respectfully submitted,

**KELLER & BENVENUTTI LLP**

25 By: /s/ Jane Kim

Jane Kim

*Attorneys for Debtors and Debtors in Possession*